REMARKS/ARGUMENTS

Applicants thank the Examiner for a careful review of this application. Applicants respectfully request reconsideration of the application in view of the following remarks. The rejections of cancelled claims 30-33 are rendered moot.

Rejections under 35 U.S.C. § 102(e):

Claims 9-11, 13, 16 and 17 were rejected under 35 USC § 102(e) over Sorvari et al. (US 2004/0043758) "Sorvari". This rejection is respectfully traversed.

Independent claim 9 has been amended to include the role of the user action proxy. As amended, the user action proxy is used to detect user actions, store information associated with user actions in a user information system, monitor each service subscribed to by the user wherein the monitoring includes detection of a pattern common to at least two services within the subscribed services by interpreting a combination of at least two service activities to mean a particular event and generate a user alert when a pattern is detected.

Sorvari does not suggest or teach each and every feature of the user action proxy as reflected in the amended independent claim 9. The Office has equated user action proxy of the claimed invention to that of a service recommendation engine/algorithm and service history log in Sorvari. As can be seen, the service recommendation engine/algorithm identifies various services that a system recommends or a user opts and provides this as a list of services at the wireless device. However, there is no mention of monitoring the services in the wireless device or detecting a pattern common to at least two services by interpreting a combination of at least two service activities to mean a particular event and to generate a user alert when such a pattern is detected.

Sorvari et al. defines, for example, a wireless device, such as a phone, PDA, that is enabled to compile multiple lists of bookmarks, wherein lists may be organized on the basis of user access. A mobile telecommunications device includes a browser to permit a user to navigate between different pages and display information therefrom. The device has a processor to compile various lists of bookmarks. The lists contain entries selected by the user or may have bookmarks downloaded to the device, by a network operator. The lists can also include the bookmarked addresses accessed most recently or most frequently by the user. The lists can have entries corresponding to addresses previously accessed by the user manually typing the address into the handset. The lists may be restricted to a limited amount of entries, or may contain all the entries in the bookmark list or manually entered, in order of frequency of access by the user. As can be seen from the aforementioned summary, Sorvari does not suggest or teach all the limitations of the amended independent claim 9.

Dependent claims 10-11, 13, 16 and 17 include all the limitations of the amended independent claim 9 and are therefore patentably distinct from Sorvari for the same reasons as independent claim 9. Based on the aforementioned argument, Applicant submits that the claims 9-11, 13, 16 and 17 are patentable over Sorvari and requests the Office to withdraw the 102(e) rejection.

Rejections under 35 U.S.C. § 103(a):

Claims 22-25 and 27 were rejected under 35 USC § 103(a), as being unpatentable over Sorvari in view of Foladare et al. (6,249,815) "Foladare". This rejection is respectfully traversed.

Independent claim 22 has been amended to include monitoring each service from a set of services displayed on the mobile device. The monitoring includes detecting a pattern common to at least two services from the set of services by interpreting a combination of at

least two service activities from the set of services to mean a particular event. Upon detecting a pattern, a user alert is generated. Foladare does not suggest or teach these features of the amended independent claim 22.

Foladare teaches a service optimizer to establish an initial subscriber profile relating to a subscriber upon subscribing to a service. The optimizer uses service data within the subscriber profile to administer a service for the subscriber. The initial subscriber profile contains personal and service information particular to the subscriber. The service optimizer analyzes the personal and service information in the subscriber profile to alter the service data used by the service optimizer to more efficiently administer the service.

As can be seen, Foladare does not teach the features of the amended claim and, hence, does not cure the deficiencies of Sorvari. As a result, applicant submits that the independent claim 22 is patentably distinct from the combined teachings of Sorvari and Foladare. Claims 23-25 and 27 are dependent on the independent claim 22 and include all the limitations of the independent claim 22. Based on the aforementioned arguments with reference to claim 22, applicant submits that the dependent claims 23-25 and 27 are patentably distinct from the combined teachings of Sorvari and Foladare and, therefore, request the withdrawal of the 103(a) rejection. .

Claims 14 and 15 were rejected under 103(a) as being unpatentable over Sorvari in view of Fano et al. (US Publication No. 2002/0133545) (hereinafter Fano). Claims 14 and 15 include all the limitations of the independent claim 9. Fano teaches a location based user interface that initiates a location-based service based upon the location of the user. (See Fano at page 2, paragraph 23; page 10, paragraphs 94-96). Fano does not suggest or teach the limitations of the amended independent claim 9 and, hence, does not cure the deficiencies of Sorvari.

Further, claim 15 of the claimed invention has been amended to further define the role

of the service aggregator. As amended, the service aggregator examines service descriptor

data associated with at least two services from a set of services available to the mobile device

to determine if the services can be combined and then dynamically combining the at least two

services into a linked aggregated service using the service description data associated with

each of the at least two services when the determination allows combining the two services.

The combined linked aggregated service provides information from each of the services to

the user in a pooled form. As can be seen, Fano does not suggest or teach these features of

the amended claim 15. Accordingly, it is respectfully submitted that the dependent claims 15

is patentable over the Sorvari and Fano combination, for at least the aforementioned reasons

and for the reasons the independent claim 9 is believed patentable.

Claims 28 and 29 were rejected under 103(a) as being unpatentable over Sorvari in

view of Foladare et al. and further in view of Fano et al. Fano teaches a location based user

interface that initiates a location-based service based upon the location of the user. (See Fano

at page 2, paragraph 23; page 10, paragraphs 94-96). Fano teaches a mobile valet that

coordinates the delivery of services to create what is referred to as a "symphonic experience"

or "pooled experience". According to Fano, a mobile device may be used to coordinate the

delivery of services available at a given context or location in a manner that enhances the

overall experience and effectiveness of the mobile user to accomplish tasks within that

context or location. Context includes information relating to the user's location, task or

function that may be based in-part on environmental cues. The context may also be

determined by objects they are currently looking at, what they have recently looked at,

alternatives available locally, etc.--that is, information about where the users are and what

they're doing at that moment. The mobile device, in Fano, is metaphorically thought of as an

"orchestra conductor's baton", which "coordinates" the delivery of "services" provided by each instrument section to create a symphony. (See paragraph [0009] of Fano).

The "symphony" or "pooled" experience, in Fano, is defined basically as bringing all the services that are available for that location or context together and presenting the services at the mobile device. The pooled experience of Fano is different from the pooled form of the claimed invention. In Fano, there is no suggestion or teaching to examine service descriptor data associated with individual services to determine if at least two of the services can be combined and then dynamically combining the at least two of the services into a linked aggregate service using the service description data. In fact, in Fano, each of the services are kept distinct just like each "instrument section" of a "symphony" is kept distinct. In contrast, the claimed invention, as amended in claim 29, teaches examining service descriptor data associated with at least two individual services (from a set of services available to the mobile device) to determine if the services can be combined and then dynamically combining the at least two services into a linked aggregate service using the service description data associated with each of the services being linked, once it is determined that it is okay to combine the two services. (See paragraph [0051] of the claimed invention). This is combining two different services (such as map service with movie service) into one so as to enrich a user's experience. As can be seen, the teachings of Fano are different from the teachings of the claimed invention. Consequently, it is submitted that Fano does not cure the deficiencies of Sorvari and Foladare. Based on the argument, it is respectfully submitted that claim 29 is patentably distinct from the combined teachings of Sorvari and Fano.

Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present amendment, the Examiner is requested to contact the undersigned at (408) 749-6905. If any additional fees are due in connection with filing this

amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805

(Order No. SUNMP324). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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